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March 7, 2023

**VIA ECF**

The Honorable Stewart D. Aaron  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Chicas, et al. v. Kelco Construction, Inc., et al.***  
**21-cv-09014-PAE-SDA**

Dear Judge Aaron:

Our firm represents Defendants Kelco Construction, Inc., E.L.M. General Construction Corp., John Kelly, and Joseph Provenzano (collectively, "Defendants"). By this letter, Defendants request an adjournment of deadlines set forth in Your Honor's Opinion and Order, dated February 19, 2023, bearing ECF No. 101 ("February 19 Order"). This is the first request for an extension of these deadlines set forth in the February 19 Order.

After conferring with Plaintiffs' counsel, Defendants would like to respectfully request for Your Honor to review and approve the following proposed deadlines:

- By **March 10, 2023**, Defendants must produce the three (3) Excel spreadsheets of the putative collective members' information as requested by Plaintiffs in their Motion. The current deadline is March 7, 2023.
- By **March 14, 2023**, the parties must file a joint letter to the Court if there are any disputes regarding the (i) the specific jobsite locations to post the Notices and the (ii) time frame in which to complete such postings. The current deadline is March 10, 2023.
- By **March 21, 2023**, Plaintiffs' counsel must furnish the court-approved Notice by first-class mail and email to each putative collective member in English or Spanish. The current deadline is March 17, 2023.

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Plaintiffs have consented to this request.

To date, Plaintiffs have provided their proposed form of Notice to Defendants, as set forth in the February 19 Order. Defendants are currently in the process of reviewing the revisions to Plaintiffs' proposed Notice.

We thank you for your attention to this matter.

Sincerely,

*/s/ Eli Z. Freedberg*

Eli Z. Freedberg  
Shareholder

EZF